

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LAW OFFICES OF THOMAS D. GEARON, P.C.

Thomas D. Gearon, Esq.

136-20 38th Avenue

Suite 9i

Flushing, NY 11354

(718) 395-8103

Attorneys for Plaintiffs

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GUO RONG ZHAO, individually and on behalf of other employees
Similarly situated,

Plaintiffs,

Case No.: 15 Civ. 681

-against-

**F&T MANAGEMENT & PARKING CORP., CP PARKING
CORP., SUNNY CHIU, THOMAS CHANG, JOHN DOE
AND JANE DOE #1-10**

Defendants.

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NOTICE OF DEPOSITION DUCES TECUM

TO: **GUO RONG ZHAO**
c/o Hang & Associates PLLC
136-18 39th Avenue Suite 1003
Flushing, NY 11354

PLEASE TAKE NOTICE that Defendants' counsel for **F&T MANAGEMENT & PARKING CORP., CP PARKING CORP., SUNNY CHIU, THOMAS CHANG, JOHN DOE AND JANE DOE #1-10**, has scheduled the deposition of Plaintiff **GUO RONG ZHAO** for **Friday July 31, 2015 at 10:00 a.m.**, regarding the issues pertaining to this litigation. We are requesting that any documents and/or information pertaining to this pending action be brought to the deposition for photocopying, at the business center offices of Queens Crossing, 138-20 38th Ave., 3rd Floor, Flushing, New York 11354, before a Court Reporter who is not counsel to the parties or

interested in the event or cause, upon oral examination for discovery, for use at trial, and for any other purpose permitted under the Federal Rules of Civil Procedure. The taking of this deposition shall be recorded by stenographic means and may be recorded in whole or part by videotape and shall continue from day to day until completed.

Dated: July 28, 2015

Respectfully submitted,

By: /s/ Thomas D. Gearon

Thomas D. Gearon, Esq.

LAW OFFICE OF THOMAS D. GEARON, P.C.

136-20 38th Avenue Suite 9i

Flushing, New York 11354

Phone: (718) 395-8103

Attorney for Defendants

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I hereby certify that a true and correct copy of the foregoing was sent via USPS to: (i) Attorney for Plaintiff GUO RONG ZHAO, at Hang & Associates PLLC 136-18 39th Avenue Suite 1003 Flushing, NY 11354 on this 28th day of July, 2015.

Respectfully submitted,

By: /s/ Thomas D. Gearon
Thomas D. Gearon, Esq.
LAW OFFICE OF THOMAS D. GEARON, P.C.
136-20 38th Avenue Suite 9i
Flushing, New York 11354
Phone: (718) 395-8103
Attorney for Defendants

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